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Attorney for Tasha Teherani-Ami, in her capacity as
the trustee of the Sonja Dinihanian GST Trust DTS 1/1/11

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re:)	Case Nos.
)	19-31883-dwh11 (Lead case)
15005 NW Cornell LLC and)	19-31886-dwh11
)	
Vahan M. Dinihanian, Jr.)	Jointly Administered Under
)	19-31883-dwh11
Debtor(s).)	
)	TASHA TEHERANI-AMI'S MOTION, IN
)	HER CAPACITY AS THE TRUSTEE OF
)	THE SONJA DINIHANIAN GST TRUST
)	DTS 1/1/11, FOR EXTENSION OF TIME
)	TO SUBMIT BALLOT

LBR 7007-1(a)(1) Certification

Counsel for Tasha Teherani-Ami ("Ms. Teherani-Ami"), in her capacity as the trustee of
the Sonja Dinihanian GST Trust DTS 1/1/11 (the "Trust") certifies that the parties made a good
forth effort through counsel to confer in an attempt to resolve the matters in this motion, however,

1 after an exchange of emails, they have been unable to do so.

2 **Motions**

3 The Trust, by and through her attorneys, moves the Court under FRBP 9006(b)(2) for an
4 order extending the deadline to September 3, 2021, so the ballots the Trust submitted on that date
5 may be counted regarding the Debtors' proposed Second Amended Joint Plan of Reorganization
6 Dated July 22, 2021 (Dkt #402)("July Plan").

7 **Procedural Background**

8 The debtors filed their July Plan on July 23, 2021. The Court approved the associated
9 disclosure statement on July 26, 2021. Debtors served the order including the ballot form on July
10 30, 2021. The deadline for submission of a ballot was August 31, 2021. The Trust filed its ballots
11 on September 3, 2021.

12 **Conclusion**

13 The Trust requests an order extending the deadline to submit ballots to September 3, 2021,
14 so that the Trusts ballots which have been submitted can be accepted and counted.

15 Dated September 7, 2021.

16 WYSE KADISH LLP

17 /s/ Bruce H. Orr

18 Bruce H. Orr, OSB No. 813297

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20 Telephone: (503) 228-8448

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22 Of Attorneys for Tasha Teherani-Ami, in her
23 capacity as the trustee of the Sonja Dinihanian
24 GST Trust DTS 1/1/11

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NONE

/s/ Bruce H. Orr
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Of Attorneys for Tasha Teherani-Ami, in her
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GST Trust DTS 1/1/11

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1 **CERTIFICATE OF SERVICE**

2 On September 7, 2021, I served copies of the above TASHA TEHERANI-AMI'S
3 MOTION, IN HER CAPACITY AS THE TRUSTEE OF THE SONJA DINIHANIAN GST
4 TRUST DTS 1/1/11, FOR EXTENSION OF TIME TO SUBMIT BALLOT on the following
entitled to notice:

5 1) through CM/ECF:

6 Douglas R. Pahl
Attorney for debtor 15005 NW Cornell LLC

Nicholas J. Henderson
Troy Sexton
Attorneys for debtor Vahan M. Dinihanian

7 Stephen P. Arnot
8 U.S. Trustee

Eleanor A. Dubay
Attorney for creditor Tasha Teherani-Ami

9 Elayna Z. Matthews
10 Attorney for Columbia State Bank

Daniel L. Steinberg
Attorney for Cornell Road LLC; Lillian
Logan

11 Erich M. Paetsch
Attorney for Columbia State Bank

Russell D. Garrett
Attorney for Alexander LLC, et al.

12 2) using paper by first class mail on those who do not participate in this case through
13 CM/ECF:

14
15 DATED: September 7, 2021

16 /s/ Bruce H. Orr
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